

Application No. 10/761,082

### REMARKS

In the most recent Office Action, independent claim 1, along with its dependent claims 2-7, has been rejected under 35 USC 102(b) as anticipated by Alicea.

In the above Amendment, claim 1 has been amended to further recite crease rolls "operable to fold at least one sheet passing through the folding nip along the process direction and to fold a sticker applied to a sheet moving along the reverse direction." Originally-filed dependent claims reciting this structure have been cancelled.

Looking at Figure 2 of the Specification as filed, it can be seen that a sheet S, which has been already folded by crease rolls 10, 12, moving backwards to receive on its trailing edge a sticker ST, can be backed up into the nip 16 formed by crease rolls 10, 12, so that the sticker ST is folded over the two sides of the folded sheet. Thus, in the illustrated embodiment and in the claimed invention, the crease rolls 10, 12 have **two functions**: they *originally* fold the sheet, **and then** they fold the sticker on the trail end of the folded sheet when the sheet is moving in the reverse direction.

This structure is nowhere taught by Alicea. Rollers 41, 42, as cited in the rejection, indeed are capable of moving a folded sheet backwards to receive a sticker on the trail edge thereof, such as shown at Figure 13 of Alicea. However, there is no teaching that the rollers are ever used for *folding* in any way. Indeed, as stated right at column 1, lines 5-13 of Alicea, the whole disclosure is directed to processing self-mailers that are *already* folded. So the "two-function" aspect of the crease rolls in claim 1 is not taught in Alicea.

In the rejection, some discussion is made to distinguish structure from function in the claim language. Among other arguments, it may be said that the physical proximity of the crease rolls to the recited roller pair and the recited sticker applicator, which enables the recited function (the folded sheet can be "backed up" to have the sticker folded over its trail edge by the *same* crease rolls

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which originally folded the sheet), is an unambiguous *physical* distinction of the claimed invention over the reference.

Absent any discussion of crease rollers that can fold a sheet and then fold a sticker over the trail end of the sheet, Alicea cannot anticipate claim 1 as amended, or its dependent claims.

Claim 8 has been rejected as being obvious for the reasons given with regard to Alicea, and further in view of Meetze. This rejection is deemed obviated in view of the above amendment to claim 1, from which claim 8 is dependent.

The claims are therefore in condition for allowance.

No additional fee is believed to be required for this amendment; however, the undersigned Xerox Corporation attorney authorizes the charging of any necessary fees, other than the issue fee, to Xerox Corporation Deposit Account No. 24-0025.

In the event the Examiner considers personal contact advantageous to the disposition of this case, he is hereby requested to call the undersigned attorney at (585) 423-3811, Rochester, NY.

Respectfully submitted,



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